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12 Attorneys for Defendant

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 JACQUELYN MARZAN,)
16 Plaintiff,) Case No.: 2:21-cv-01647-DJA
17 v.)
18 KILOLO KIJAKAZI,) **STIPULATION TO VOLUNTARY
19 Acting Commissioner of Social Security,) REMAND PURSUANT TO SENTENCE
20 Defendant.) FOUR OF 42 U.S.C. § 405(g) AND TO
21) ENTRY OF JUDGMENT FOR
22) PLAINTIFF
23)
24)
25)
26)**

20 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
21 attorneys, and with the approval of the Court, that this action be remanded for further administrative
22 action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

23 On remand, the Appeals Council will remand the case to a new administrative law judge (ALJ)
24 for a new decision. Upon remand, the Appeals Council will direct the ALJ to further evaluate
25 Plaintiff's residual functional capacity; further evaluate the opinion evidence; if warranted, obtain
26 vocational expert testimony to assist in determining whether there are jobs that exist in significant

1 numbers in the national economy that Plaintiff can perform with her residual functional capacity,
2 resolving any conflicts between the expert's testimony and the Dictionary of Occupational Titles; take
3 any action necessary to complete the administrative record; offer Plaintiff an opportunity for a hearing;
4 and issue a new decision.

5 The parties further request that the Clerk of the Court be directed to enter a final judgment in
6 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.
7

8 Dated: April 29, 2022 Respectfully submitted,

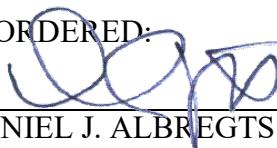
9 RICHARD HARRIS LAW FIRM

10 */s/ Richard A. Harris*
11 RICHARD A. HARRIS
12 (*as authorized via email on April 29, 2022)
13 Attorney for Plaintiff

14 Dated: April 29, 2022 Respectfully submitted,

15 CHRISTOPHER CHIOU
16 Acting United States Attorney

17 */s/ Allison J. Cheung*
18 ALLISON J. CHEUNG
19 Special Assistant United States Attorney
20 Attorneys for Defendant

21 IT IS SO ORDERED:
22 
23

24 HON. DANIEL J. ALBREGTS
25 UNITED STATES MAGISTRATE JUDGE
26

27 DATED: May 3, 2022
28

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Richard A. Harris
rick@richardharrislaw.com
Attorney for Plaintiff

Joshua R. Harris
josh@richardharrislaw.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2022

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney